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29 *\*Pro hac vice application forthcoming*

30 *Attorneys for Defendant*  
31 *MGM Resorts International*

32 **UNITED STATES DISTRICT COURT**  
33 **DISTRICT OF NEVADA**

34  
35 TONYA OWENS, individually and on behalf of  
36 all others similarly situated,

37 Plaintiff,

38 v.

39 MGM RESORTS INTERNATIONAL,

40 Defendant.

41 Case No. 2:23-cv-1480-RFB-VCF

42 **STIPULATION TO EXTEND TIME**  
43 **TO FILE DEFENDANT'S**  
44 **RESPONSE TO COMPLAINT**  
45 **(SECOND REQUEST)**

1 Pursuant to LR IA 6-1, Plaintiff Tonya Owens and Defendant MGM Resorts  
 2 International (“MGM”) (collectively, the “Parties”) respectfully stipulate MGM’s time to  
 3 respond to the Complaint be extended from the current deadline of December 12, 2023, to  
 4 and including January 11, 2024. This is the second stipulation for an extension of time to  
 5 file MGM’s responsive pleading. The court previously granted an extension on October 26,  
 6 2023. ECF No. 15.

7 Good cause exists to enlarge the time for MGM to respond to the Complaint. There  
 8 are currently ten other related actions filed against MGM pending in the District of Nevada  
 9 (the “Related Actions”). *See Kirwan v. MGM Resorts Int’l*, No. 2:23-cv-01481; *Zussman v.*  
 10 *VICI Properties 1 LLC, et al.*, No. 2:23-cv-01537; *Lackey v. MGM Resorts Int’l*, No. 2:23-  
 11 cv-01549; *Pircio v. MGM Resorts Int’l*, No. 2:23-cv-01550; *Terezo v. MGM Resorts Int’l*,  
 12 No. 2:23-cv-01577; *Rundell v. MGM Resorts Int’l*, No. 2:23-cv-01698; *Bezak v. MGM*  
 13 *Resorts Int’l*, No. 2:23-cv-01719; *Albrigo v. MGM Resorts Int’l*, No. 2:23-cv-1981; *Zari v.*  
 14 *MGM Resorts Int’l*, No. 2:23-cv-01777; *Manson v. MGM Resorts Int’l*, No. 2:23-cv-01826.  
 15 One other action is pending in the District of New Jersey. *Lassoff v. MGM Resorts Int’l*, No.  
 16 1:23-cv-20419.

17 The parties in the Related Actions are actively preparing a joint motion to consolidate  
 18 the Related Actions. As such, additional time is required to permit time to meet and confer  
 19 with the various parties to the Related Actions and finalize the joint motion.

20 The Parties’ request is made in good faith to enable the parties to finalize the joint  
 21 motion for consolidation and conserve judicial and party resources. Moreover, this case is  
 22 in its infancy, and this request will not prejudice any party.

23 **WHEREAS** the Parties respectfully request that MGM shall have until January 11,  
 24 2024, to answer, move, or otherwise respond to the Complaint.

25       ///  
 26       ///  
 27       ///  
 28       ///

STIPULATION TO EXTEND TIME TO FILE DEFENDANT’S RESPONSE TO COMPLAINT  
 CASE NO. 2:23-CV-1480

1 Dated: December 11, 2023

Respectfully submitted,

2 /s/ Nathan R. Ring  
3

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22 *Class*

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38 *Attorneys for Defendant*  
39 *MGM Resorts International*

40 **IT IS SO ORDERED:**



41  
42 THE HONORABLE Cam Ferenbach  
43 UNITED STATES MAGISTRATE JUDGE

44  
45 DATED: 12-12-2023